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Special Counsel to Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>SECURITIES INVESTOR PROTECTION CORPORATION, v. Plaintiff-Applicant,</p> <p>BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.</p>	<p>Adv. Pro. No. 08-01789 (SMB) SIPA LIQUIDATION (Substantively Consolidated)</p>
<p>In re: BERNARD L. MADOFF, Debtor.</p>	
<p>IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, v. Plaintiff, STANLEY I. LEHRER, in his capacity as administrator of the Stanley I. Lehrer and Stuart M. Stein, J/T WROS; LINDA SOHN; NEAL M. GOLDMAN; ELAINE STEIN ROBERTS; EUNICE CHERVONY LEHRER; TRUST U/T/A 8/20/90; and EVELYN FISHER, individually, and in her capacity as Trustee for TRUST U/T/A 8/20/90, Defendants.</p>	<p>Adv. Pro. No. 10-05259 (SMB)</p>

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL OF
DEFENDANT LINDA SOHN FROM ADVERSARY PROCEEDING**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, et seq. (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Windels Marx Lane & Mittendorf, LLP, and defendant Linda Sohn (“Defendant”), by and through her counsel, Mintz & Gold LLP (together, the “Parties”), hereby stipulate and agree to the following:

1. On February 1, 2016, the Trustee filed a Second Amended Complaint against Defendant and others.
2. On July 15, 2016, Defendant filed an Answer to the Second Amended Complaint.
3. On March 7, 2017, the Parties entered into a settlement agreement pursuant to the Settlement Procedures Order entered by this Court on November 12, 2010 [Dkt. No. 3181] (the “Settlement Agreement”).
4. In accordance with Federal Rule of Bankruptcy Procedure 7041, and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice and without costs to either party of the Trustee’s claims against Defendant in the above-captioned adversary proceeding.
5. Upon the dismissal of Defendant, the caption of the adversary proceeding is hereby amended to delete Defendant from the caption. The amended caption of the adversary proceeding shall appear as indicated in Exhibit A to this Stipulation and Order.
6. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties in interest.

7. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: New York, New York
March 15, 2017

By: /s/ Howard L. Simon
Howard L. Simon (hsimon@windelsmarx.com)
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Special Counsel for Irving H. Picard, Esq., Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff

Dated: New York, New York
March 15, 2017

By: /s/ Terence W. McCormick
Steven G. Mintz (mintz@mintzandgold.com)
Terence W. McCormick (mccormick@mintzandgold.com)
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Attorneys for Defendant Linda Sohn

SO ORDERED

Dated: March 20th, 2017

/s/ STUART M. BERNSTEIN
HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

Exhibit A

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SOUTHERN DISTRICT OF NEW YORK**

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